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Executive Summary PACFISH Field Reviews August - November 1995

Prepared by:
PACFISH Review Teams
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INTRODUCTION

PURPOSE

The purpose of this executive summary is to provide an overview of implementation and understanding of the PACFISH management strategy on USDI Bureau of Land Management (BLM) and USDA Forest Service (FS)-administered lands. Findings are based on field observations and discussions with technical staff and line officers during seven two to three day visits between August and November 1995. Findings summarized in this overview represent a consensus of the perceptions among the review team members on how well PACFISH was understood and applied to management actions. Review teams (Appendix 1) were comprised of technical staff and line officers from the FS and BLM and technical staff from the USDI Fish and Wildlife Service (FWS) and USDC National Marine Fisheries Service (NMFS).

BACKGROUND

PACFISH is an aquatic conservation strategy that applies to FS and BLM administered lands within the States of Washington, Oregon, Idaho, and California that support anadromous fish species and are not included under guidance from the Northwest Forest Plan (Appendices 2 and 3). The Strategy was jointly developed by the FS and the BLM. The FS and BLM received a Biological Opinion from the NMFS dated January 23, 1995 supporting implementation of the PACFISH strategy. The strategy became effective with the signing of the Decision Notice/Decision Record Finding of No Significant Impact Environmental Assessment in February 1995. It is an 18-month interim approach that amended FS Forest Plans and BLM District Land Use Plans.

It is intended to maintain long-term management options being considered in geographically specific Environmental Impact Statements (EISs) or Environmental Assessments (EAs) for California and by the Interior Columbia Basin Ecosystem Management Project draft EISs (ICBEMP EIS) for eastern Oregon and eastern Washington; and for Idaho and Western Montana. These documents are intended to amend and replace the PACFISH direction upon their completion. PACFISH is consistent with the Northwest Forest Plan and the Columbia River Anadromous Fish Policy. The guidance provided in PACFISH was used in the development of the INFISH Strategy (Appendix 4).

PACFISH established interim goals and objectives, identified the areas that most influence the quality of water and fish habitat, provided special protective standards to guide management activities that could impact these areas, and outlined monitoring requirements for tracking field application. The strategy focused on the screening of ongoing projects to ensure that they did not pose an unacceptable risk to anadromous fish resources. It also directed Forests and BLM Districts to follow the PACFISH direction for all new projects planned during the interim period. PACFISH directed units to document changes in Riparian Management Objectives (RMOs) and Riparian Habitat Conservation Areas (RHCAAs) where modifications to specified direction were to be made. It called for the establishment of an

Implementation Monitoring Team to evaluate agency accountability in meeting the PACFISH direction.

In order to assist field units with implementation of PACFISH, five workshops were held for Forest and BLM District personnel responsible for implementation during March and April 1995, in addition local representatives from the FWS and NMFS attended these workshops. Questions generated at these workshops were responded to by the Implementation Team and sent to the field units as additional direction and clarification to existing direction on May 24, 1995. The procedures for the documentation of changes in the interim PACFISH RMOs and/or RHCAs; Recommended Livestock Grazing Guidelines (which addressed the process for assessing Proper Functioning Condition), and Ongoing Activity Screening for non-Listed Anadromous Fish were also sent out to the field at that time. Directions to clarify implementation monitoring was sent to the field on June 23, 1995, with a request that Forests and BLM Districts prepare reports summarizing management actions for the calendar year 1995.

Seven PACFISH field reviews were conducted between August and November 1995. The purpose of these reviews were to: (1) assess the extent of PACFISH implementation. (2) identify items requiring clarification or further direction; and (3) identify barriers to successful implementation. The reviewers spent two to three days in the field at each National Forest and BLM District. Prior to the reviews, each field unit was sent a list of topics the team would address (Appendix 5). The write-ups for these reviews have been forwarded to the participating units and to all PACFISH Forests and BLM Districts. The PACFISH Implementation Team viewed these reviews as a learning process to more clearly understand and articulate the PACFISH direction.

FINDINGS

The following summarizes the findings of the PACFISH field reviews.

In general, the field reviews showed that BLM offices had a good understanding and firm commitment to implement PACFISH. Overall, the FS showed a wide range of understanding and commitment to PACFISH implementation. The review teams were not able to visit all field units and at specific field visits were taken to areas selected by the Forest or BLM District. Table 1 represents the perception of the PACFISH teams based on limited field office review and verbal communication with both line managers and staff.

1. Line and staff understanding of PACFISH - Although differences exist among Forests and Districts, in general, staff had a better understanding than line managers of the PACFISH objectives, standards and guidelines (S&Gs), and overall direction. Based on statements made during some of the field reviews, some personnel did not appear to understand the flexibility within the PACFISH Environmental Assessment (EA) afforded to decision makers in adjusting PACFISH RMOs and RHCAs. Statements such as "this is a one size fits all strategy," reinforces this point. Yet, at some field offices, there was excellent support of all concepts and understanding of inherent flexibility within the PACFISH strategy.

TABLE 1

General Summary Of Findings For Nine Subjects After PACFISH Field Reviews On Selected National Forests And BLM Districts

(L=Low, M=medium, H=High success, NA=not assessed, ?=unable to determine based on field observations and information provided)

| | Salmon/Challis | Nez Perce | Clearwater | Ochoco/Prineville | Umatilla/Baker | Cottonwood | Los Padres |
|--------------------------------|-----------------|------------|-----------------|-------------------|----------------|--------------|--------------|
| Date Reviewed: | September 12-14 | July 27-28 | September 21-22 | October 3-5 | October 24-26 | November 1-2 | November 8-9 |
| SUBJECT | USFS / BLM | USFS | USFS | USFS / BLM | USFS / BLM | BLM | USFS |
| Line/Staff Understanding | M / H | M | H | M / M | L / H | H | M |
| Commitment | M / H | M | M | M / H | M / H | H | M |
| a.Screening b.Documentation | M / H L / L | H L | H M | L / M L / L | M / M L / L | H M | M L |
| Mod. Projects W/Unacc. Risk | NA / H | L | M | L / M | M / M | H | ? |
| Appl. of S&Gs | NA / NA | NA | NA | NA / NA | NA / NA | NA | NA |
| Doc. of Changes RMO/RHCA | L / L | L | L | L / H | L / L | L | M |
| Use of WA | L / L | L | L | H / L | L / L | L | H |
| Impl. Monitor Initiated | ? / M | L | L | L / L | L / L | M | L |

2. National Forest/BLM District commitment to PACFISH - Overall, there was good verbal commitment by most field offices to implement PACFISH. Based on the limited field reviews, it was difficult on most units to track commitments to on-the-ground results. The review teams were given rationale by Forests and BLM Districts for not completely implementing or applying the PACFISH strategy (i.e., insufficient funds and work force and conflicting priorities from other legislation, such as salvage logging and reauthorization of grazing permits). While some BLM Resource Areas and FS Districts expressed their commitment to PACFISH, both verbally and through their actions, others were less demonstrative of their commitment to an "interim strategy."

3. Screening and documentation of ongoing projects and modification of projects with unacceptable risk - Field offices in the area of listed anadromous fish species adequately completed screening for ongoing projects as part of Section 7 consultation. Screening was not consistently applied in areas outside of designated critical habitat for federally-listed anadromous salmonids. In many cases, determinations of risk were subjective decisions and documentation of rationale for the decision was poor. However, for those projects deemed to have unacceptable risk, a large proportion of the modifications the review teams observed appeared appropriate. Most modifications, however, were based on professional judgement and documentation was not readily available to support these decisions.

4. Application of PACFISH Standards and Guidelines to new projects - Except for two offices, new projects were not reviewed in the field. For those units that showed us new projects, there was good application of S&Gs. All units said they would apply PACFISH direction to new projects.

5. Documentation of changes to RMOs and RHCAs - On some units, changes to PACFISH RMOs and RHCAs were documented and supported by biological and physical habitat data. However, on most units, documentation of decision steps was minimal and data frequently appeared to be not fully analyzed. On other projects, the rationale was strictly subjective, with little data or analysis, or use of the latest scientific information to make valid determinations for changes. Many other units elected to use the default RMO values and RHCA widths without modification.

6. Use of watershed analysis - For most offices, watershed analysis had not been used and confusion existed as to its value and the level of effort needed to complete an analysis. This was most apparent on units visited in Idaho. Some BLM offices appeared to have completed analysis similar to watershed analyses using the Federal Guide 6-step process but did not document their steps and rationale. Most frequently, management decisions were based on site-specific analysis without adequate documentation of the cumulative effects of a proposed project at a watershed scale.

7. Implementation of monitoring - For those offices under Section 7 consultation for listed salmon, implementation monitoring was already an established workload. However, most offices were either not aware or confused about completing the PACFISH implementation

monitoring form that was included in the June 23, 1995, memorandum from the PACFISH Implementation Team. Because of this confusion, an amended form was sent to field units on January 12, 1996 to completed by March 1, 1996.

RECOMMENDATIONS

A. IMPROVE INTERNAL AND EXTERNAL UNDERSTANDING OF PACFISH

The PACFISH S&Gs affect nearly all FS and BLM program areas and requires the skills of many resource specialists, not just the fisheries biologists, to successfully implement. Understanding, involvement, and commitment by line managers and an interdisciplinary team of resource specialists was a key to successful implementation of PACFISH. For example, the Clearwater NF demonstrated good Interdisciplinary Team commitment to PACFISH implementation.

However, even good internal commitment and interdisciplinary coordination is not enough, involvement of adjacent landowners and the public is also critical to effective implementation of PACFISH. A notable example of the value of landowner involvement occurred in the Prineville BLM District in the Deschutes River watershed. Here, BLM lands are interspersed in large blocks of private lands. The fisheries biologists, range conservationists, and hydrologist worked as a team to explain to permittees the reasons for changes in their grazing permits (usually from May-September to early spring grazing). Most operators have voluntarily complied and a number adopted the same early spring system for their private lands. As a result, riparian vegetation improvement was evident on both BLM and private lands. In a number of cases, this kind of team effort helped carry out difficult, controversial decisions without appeals or litigation. On those units where internal and external understanding of PACFISH were weak, this needs to improved. Implementation was most successful where line managers were supportive and directly involved and an interdisciplinary team worked with the affected public land user in assessing salmon-related issues and developing solutions.

Implementation of PACFISH in California presents some unique opportunities and concerns. Uncertainty exists within some areas on the extent of lands covered by the PACFISH strategy and the duration of its application. Direction specific to California Forests and BLM Districts should clarify those lands appropriate for PACFISH and should encourage long-term application of the strategy (such as is occurring in the Los Padres NF) or until superseded by appropriate NEPA documents.

B. IMPROVE DOCUMENTATION

On every Forest and BLM District visited, the PACFISH review team observed that personnel had a strong desire to "do a good job" and a genuine concern for the land being managed. Unfortunately, the Implementation Team also observed a lack of documentation that would support management decisions and direction regarding the implementation of the PACFISH

strategy. The strategy was developed to address multi-agency concerns in the management of public lands, especially in the wake of increased petitions for federal listings of species as threatened or endangered. One inherent element to the successful implementation of PACFISH, or any management strategy, is documentation of its progress and associated actions. This not only provides a trackable and defensible paper-trail of actions, should it be needed, but also lends credibility to the decisions made by managers. Such documentation is expected of public land managers by regulatory agencies, Tribes, States, and the Public. NMFS outlined similar expectations in the PACFISH Biological Opinion on the necessity for documenting implementation of the PACFISH strategy. Professional judgement must be based on the best science available which includes site-specific and/or watershed-specific analyzed data, if available, and the thought process followed in reaching a conclusion must be documented.

It is recommended that direction be given to Forests and BLM Districts prior to the FY 96 field session to reinforce the PACFISH direction to document modifications to RMOs and RHCA's.

C. INCREASED USE OF WATERSHED ANALYSIS

Except in a few notable cases, watershed analysis was not used as the basis for modifications of PACFISH RMOs and/or RHCA.

The 6-step process in the Federal Guide to Watershed Analysis is a powerful tool that is readily adaptable for "large" and "small" analyses, such as identifying the potential effects of activities within an entire river basin or one project in a portion of a watershed. It is a process that provides the data for helping make project level decisions that are defensible, trackable and informative. It can alert the land manager when making decisions for projects as to what information is lacking or weak. For example, on the Ochoco NF, a line manager found watershed analysis to be a very useful tool in helping him make decisions for projects within his district; he further expressed a preference for making decisions pertaining to land management actions following the completion of a watershed analysis.

The 6-step process should be used to understand the current status of a watershed and the potential effects of land management projects (past and proposed) on that watershed. This process is necessary to accurately assess cumulative effects of multiple proposed projects or large projects in a watershed. Modification of RHCA's or other PACFISH standards based on site-specific analysis should occur only on isolated, small scale projects/activities where sufficient watershed-specific or stream reach-specific data are available to ensure attainment of RMOs. Site-specific analysis is inappropriate where sufficient data are unavailable to provide an accurate assessment of the site-specific and cumulative effects a proposed project will have on the major stream or watershed downstream of a project.

It is recommended that: (1) additional direction be given to Forests and BLM Districts to give priority to conduct watershed analysis using the 6-step process; and (2) watershed analysis

be refined and products that result from watershed analysis be articulated in the ICBEMP DEISs.

D. IMPLEMENT IMPLEMENTATION AND EFFECTIVENESS MONITORING

Interim direction in PACFISH and the NMFS Biological Opinion both require implementation and effectiveness monitoring. The Implementation Team was given the responsibility to provide direction to ensure consistent, coordinated monitoring of all projects within the range of PACFISH. Monitoring the implementation of PACFISH is critical for FS and BLM credibility and accountability. Monitoring will be used to verify that appropriate RHCA widths and S&Gs were applied during project implementation and to assess whether those management measures are adequate to attain PACFISH goals, RMOs, and avoid adverse effects on listed anadromous fish. Implementation monitoring is needed to both document the progress towards achieving the stated goals of PACFISH and identify the types and location of specific actions. Effectiveness monitoring is needed to determine if S&Gs were effective in achieving their objective. Variations in landscapes, watersheds, and streams, combined with the location of different types of ongoing and new projects, requires the establishment of a stratified effectiveness monitoring scheme capable of selecting appropriate watersheds and addressing site-specific issues.

It is recommended that: (1) implementation monitoring be continued as outlined by the PACFISH Implementation Team letter signed by the Regional Foresters and State Directors dated January 12, 1996, until the ICBEMP direction amends PACFISH. (2) Regional Foresters and State Directors review and take action on the PACFISH Field Teams proposed effectiveness monitoring strategy; and (3) the ICBEMP evaluate PACFISH Effectiveness Monitoring Strategy and address effectiveness implementation and monitoring in the ICBEMP DEIS.

E. CONDUCT FALL FIELD REVIEWS

The field review served as a valuable forum for sharing information and solutions on technical issues, clearing up misunderstandings, and strengthening commitment. All those who participated learned from the experience including the field personnel, review team members, and the public. We recommend a follow-up review in the fall of 1996, comparable to those conducted during 1995.

CONCLUSION

Consistently implementing an aquatic strategy for all FS and BLM lands within the range of anadromous salmonids (over 50 percent of the total habitat) is no small challenge. The review teams were encouraged by the level of commitment to implement PACFISH that was generally evident from most reviews. Field units did not identify the need to modify existing PACFISH

direction. It was particularly encouraging that much progress has been made without appeals, litigation, or widespread public opposition.

However, the team observed a consistent pattern of poor documentation of PACFISH related decisions, limited use of watershed analysis, and little or no evidence of monitoring for PACFISH implementation and effectiveness. These deficiencies must be corrected if we are to establish credibility with the Public, Tribes, State and Federal regulatory agencies and continue to avoid appeals and litigation.

APPENDIX 1 - PACFISH REVIEW TEAMS

Bureau of Land Management, USDI

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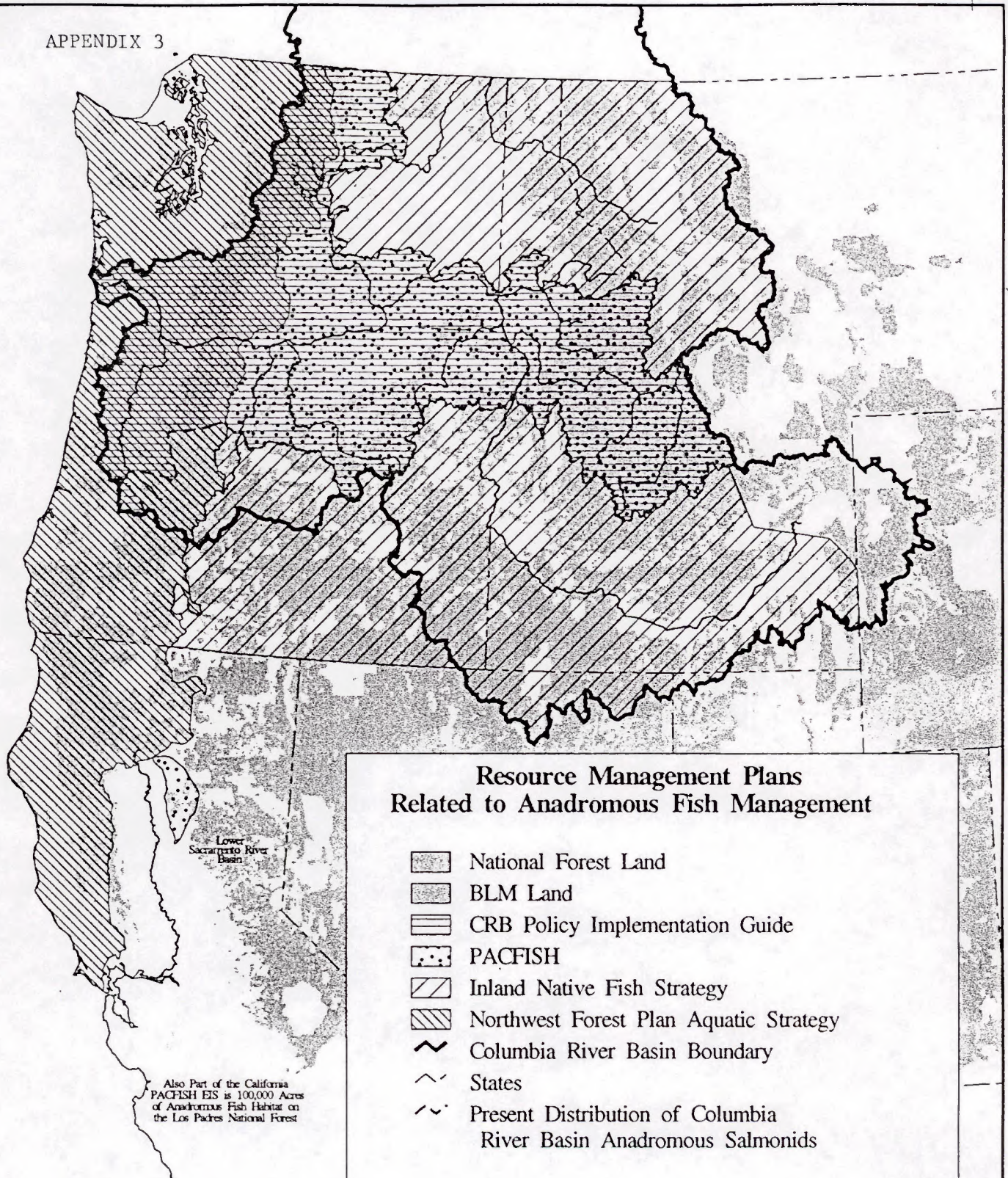
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APPENDIX 2 - AMOUNT OF ANADROMOUS WATERSHED ACREAGE

| State/Administrative Unit | Size of Administrative Units in Millions of Acres | | Anadromous Watersheds in Millions of Acres | | Anadromous Watersheds as a Percent of Total Administrative Unit | |
|---------------------------|---|-------|--|------|---|-------|
| | FS | BLM | FS | BLM | FS | BLM |
| California | | | | | | |
| Bakersfield BLM | | 1.9 | | <0.1 | | <5% |
| Lassen NF | 1.8 | | 0.4 | | 22% | |
| Los Padres NF | 1.2 | | 0.2 | | 16% | |
| Ukiah BLM | | 0.7 | | 0.1 | | 14% |
| Idaho | | | | | | |
| Boise NF | 2.3 | | 0.7 | | 30% | |
| Bitterroot NF | 1.6 | | 0.4 | | 25% | |
| Challis NF | 2.5 | | 1.6 | | 64% | |
| Clearwater NF | 1.8 | | 0.8 | | 44% | |
| Coeur d'Alene BLM | | 0.2 | | 0.1 | | 50% |
| Nez Perce NF | 2.2 | | 2.0 | | 90% | |
| Payette NF | 2.3 | | 1.7 | | 73% | |
| Salmon BLM | | 1.2 | | 1.0 | | 83% |
| Salmon NF | 1.8 | | 1.7 | | 94% | |
| Sawtooth NRA | 0.8 | | 0.3 | | 37% | |
| Oregon | | | | | | |
| Malheur NF | 1.5 | | 0.7 | | 46% | |
| Ochoco NF | 0.8 | | 0.2 | | 25% | |
| Prineville BLM | | 1.6 | | 1.2 | | 75% |
| Umatilla NF | 1.4 | | 0.5 | | 35% | |
| Vale BLM | | 5.2 | | 0.1 | | 1% |
| Wallowa-Whitman NF | 2.4 | | 1.7 | | 70% | |
| Washington | | | | | | |
| Spokane BLM | | 0.4 | | 0.1 | | 25% |
| Okanogan NF | 1.7 | | 0.3 | | 17% | |
| TOTAL | 27.7 + 9.6 = 37.3 ¹ | | 14.4 + 1.5 = 15.8 ¹ | | (46% + 37%)/2 = 42% ¹ | |
| PERCENTAGES | [74%] | [25%] | [91%] | [9%] | [54%] | [44%] |

¹ Any discrepancies are a result of rounding



BLM Land Is Not Shown For Eastern Montana

